

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAJOR LEAGUE BASEBALL PLAYERS
ASSOCIATION,

Plaintiff,

-against-

WILLIAM ARROYO, NOAH ASSAD, and
JONATHAN MIRANDA.,

Defendants.

Case No. 1:24-cv-03029-LJL

MOTION TO WITHDRAW

Defendants William Arroyo, Noah Assad, and Jonathan Miranda (collectively, “Defendants”), by and through counsel, and pursuant to Local Civil Rule 1.4, respectively move this Court for an Order allowing Leane K. Capps, formerly of Polsinelli PC, to withdraw her appearance for Defendants.

1. On April 22, 2024, Plaintiff Major League Baseball Players Association (“MLBPA”) filed their Complaint before this Court. [Doc. 1].

2. Thereafter, on May 31, 2024, the MLBPA filed their Motion to Confirm Arbitration Award (“MLBPA”). [Doc. 13].

3. On June 3, 2024, Lawrence S. Hirsh (“Attorney Hirsh”) and Mozianio S. Reliford, III (“Attorney Reliford”) both from the law firm Polsinelli PC, entered their appearances. [Doc. 18-19].

4. On June 6, 2024, Leane K. Capps (“Attorney Capps”), also at that time from the law firm Polsinelli PC, filed her Motion to Appear Pro Hac Vice, which was granted thereby entering her appearance on June 7, 2024. [Doc. 20-21].

5. After briefing, this Court denied the Motion on July 24, 2024. [Doc. 36].

6. On or about August 31, 2024, Attorney Capps resigned from Polsinelli PC. Accordingly, Attorney Capps requests leave to withdraw from her representation of Defendants in this matter.

7. No party will be prejudiced by Attorney Capps withdrawal.

8. Both Attorney Hirsh and Attorney Reliford of Polsinelli PC will remain in the case and continue to represent Defendants in this matter.

9. Attorney Capps does not assert a retaining or charging lien in this matter.

WHEREFORE, Defendants William Arroyo, Noah Assad, and Jonathan Miranda respectfully move this court for an Order allowing Leane K. Capps, formerly of Polsinelli PC, to withdraw her appearance for Defendants, and for such other relief as this Court deems proper.

Dated: November 1, 2024

POLSINELLI PC

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***Counsel for William Arroyo, Noah Assad, and
Jonathan Miranda***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of November, 2024 the foregoing was filed with the District Court using the PACER ECF filing system, and a copy of the same was sent to all attorneys of record via the PACER ECF filing system. A copy of the foregoing was also served upon Defendants' counsel *via* email, with written consent of the same, and confirmation of receipt.

/s/ Moziano S. Reliford, III
Moziano S. Reliford, III